EXHIBIT A

"CONSENT TO SUE" FORM CT COURT

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

ddress:		
City:	State:	Zip:
Telephone Number:	Social Security No.:	
E-mail Address:		
SIGNATURE:		Date: 11/11/2022

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 3 of 198



Lee Litigation Group, PLLC 148 W 24th Street, Eighth Floor New York, New York 10011 Fioracle 214 (b)

10011-195208

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLE	S,			
on behalf of himself, the Class.	FLSA	Collective	Plaintiffs,	and
		Plaintif	f,	

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

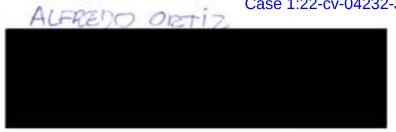
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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: ALFREDO	ORTIZ	
Address:		
City:	State:	Zip:
Telephone Number:	ocial Security No.:	
E-mail Address:		
SIGNATURE:	Da Da	nte: 11/11/2022

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 5 of 198





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Princele 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA	Collective Plaintiffs,	and
the Class,	Plaintiff,	

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: 4/1210	FDv9/a		
Address:			
City: _	_State:	Zip: _	
Telephone Number:	ocial Security No.:		
E-mail Address:	<0/11/		
SIGNATURE:		Date: 27/28/201.	2

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 7 of 198



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148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)





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"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT

	ERN DISTRICT OF NEW YORK ON CHARLES,
100	lf of himself, FLSA Collective Plaintiffs, and
The Cita	Plaintiff,
	v.
PINNA	CLE TOO, LLC,

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: ADDCES	Hicolog	a FORGEM	LOYELD		
Address:					
City: _		State		Cip: _	
Telephone Number:		cial Secur	ity No.:_		Ŀ
E-mail Address:					
SIGNATURE:	771		Date: _	12/26/20	22

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 9 of 198

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011. Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA	Collective Plaintiffs,	and
the Class,		

Plaintiff,

Defendants

٧.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Fax: (212) 465-1181

Address:		
City:	State:	Zip:
elephone Number:	Social Security No.:	_
-mail Address:		
IGNATURE: Angel E. J	varer	Date: 11-7 - 2022

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Lee Litigation Group, RLLC 148 West 24THSt, Eighth Floor New York, N.Y. 10011

10011-195208

ոլդիրաներիր բրանի արկրիր հունարի հայարին ի

UNITED	STATES	DISTR	ICT	COL	JRT
SOUTHE	ERN DIST	RICT (OF N	EW	YORK

SOUTHERN DISTRICT OF	NEW YORK
DEXLON CHARLES,	
on behalf of himself, FLSA C	ollective Plaintiffs, and
the Class,	
	Plaintiff,
v.	
PINNACLE TOO, LLC,	EDIC

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA,

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Angel Mer	cado	
Address:	ê	
City:	State:	_Zip:
Telephone Number:	Social Security No.:	6
E-mail Address:		
SIGNATURE: angel m	vicado	Date: 11/2/22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SOUTHERN DISTRICT OF	I MEW TORK
DEXLON CHARLES, on behalf of himself, FLSA	Collective Plaintiffs, and
the Class,	Plaintiff,
v.	
PINNACLE TOO, LLC, d/b/a PINNACLE ELEC	CTRIC,

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Antonio Flo	live's	
Address		
City:	State	Zip:
Γelephone Number:	ial Security No.:	
E-mail Address		
SIGNATURE:	~	Date: 10.7-22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLS. the Class.	A Collective Plaintiffs, and
	Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Name: ARTHUR lee	- TINKSTOW	
Address		
City	State:	_Zip:
Telephone Number:	al Security No.:	
E-mail Address:		
SIGNATURE: Atthir 1.	for Hohm	Date: 11/02/2011





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
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on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

٧.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR.,

and ANTONY GIRONTA,

Case No.: 22-cv-04232

Defendants

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Brandon Bu	dhoo	
Address:		
City:	State	Zip:
Telephone Number	Social Security No.:_	
E-mail Address:		
SIGNATURE: BROWNSH	Rushr	Date: 11/2/22





Lee Litigation Group, FLLC 148 West 24th Street, 8th Floor New York, NY 10011 Planacle 216 (b)

UNITED	STATES	DISTI	RICT	COL	JRT
SOUTHE	ERN DIST	RICT	OF N	EW	YORK

DEVI ON CHARLES	
DEXLON CHARLES,	
on behalf of himself, FLSA the Class,	Collective Plaintiffs, and
	Plaintiff

V

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

	opez Salazi	
ddress		
City: _	State:	Zip: _
elephone Number	ocial Security No.	
E-mail Address		8
SIGNATURE: DRYAM LOPEZ		Date: 11 /15/22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Finnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLC	N(CH/	ARL	ES.

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Defendants

Name: Calbert Nie	ves Castillo	
Address:		
City	State:	Zip
Telephone Numbe	ocial Security No.	
E-mail Address:		
SIGNATURE: Calle of pice	ws	Date: 12/01/2022

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 23 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacie 216 (b)

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"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SOUTHERN DISTRICT OF NEW YORK	
DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and the Class,	
Plaintiff,	
v.	
PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC,	Case No.: 22-cv-04232
FRANKCRUM 6 INC	

d/b/a FRANKCRUM, FRANK CRUM JR.,

and ANTONY GIRONTA,

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Defendants

Name: (arlos	Bravo		
Address:			
City:	State:		_Zip;
Telephone Number:	locial Sec	urity No.	
E-mail Address:			
SIGNATURE:	Pravo	Date:	2-1-22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOURILL DIGITUEL	OI ITELL I OTHER
DEXLON CHARLES,	
on behalf of himself, FLSA the Class,	Collective Plaintiffs, and
	Plaintiff,
v.	

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Defendants

Name:	canlos	Diaz	ORtiz			-)
Address:						_
City:			State: _		_Zi	
Telephone Nu	umbe	Soc	cial Security No).:		
E-mail Addre	ess:					
SIGNATURE	: Carlo	s Diaz	ORdiz	Date:	12-06-2022	7

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 27 of 198





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Finnacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TATEMET CANDELL A DE	
	D.C.
DEXLON CHARL	

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

Defendants

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C. K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011

Tel: (212) 465-1180

Fax: (212) 465-1181

decisions on my benan concer	and the migation and any serve		
Name: CARLOS	Jimen 2		-
Address			-
City:	State:	Zip:	
Telephone Number	Social Security No.:_		
E-mail Address			-
SIGNATURE: Call		Date: 11/10/22	

SARUS Jimenez

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 29 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

10011-195208

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA the Class.	Collective Plaintiffs,	and
2000 A CONTROL	Plaintiff,	

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Carlos Me	6/A	
Address		
City:	State:	Zip:
Telephone Number:	ocial Security No.:	
E-mail Address:		
SIGNATURE:		Date: 11/06/2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,			
on behalf of himself, FLSA	Collective	Plaintiffs,	and
the Class,			

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Cesar A. A	ernandez	
Address:		
City:	State:	Zip
Telephone Number	ocial Security No.	
E-mail Address:		
SIGNATURE COSON FORDING	2_	Date: 11/7/22





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pannacie 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA C	Collective Plaintiffs,	and
the Class,		

Plaintiff,

Defendants

v.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA, Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Christia	n.L. Salinas
Address:	
City: _	State: _ Zip:
Telephone Number	ocial Security No.:
E-mail Address:	
SIGNATURE: SPITTON	Salinas Date: 10-17-22



Lee Litigation Group, PLLC 148 West 24th Street, 3th Floor New York, NY 10011 Pinnocle 215 (b)

UNITED STATES DISTI	RICT COURT
SOUTHERN DISTRICT	OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, and	
the Class,	
Plaintiff,	
v.	
	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA	

Defendants

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Cristian Riofric				
City:	State:		Zip:	
elephone Number:	Social Security No.:			
E-mail Address:				
-		Date:	W	2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEVLONCHABLES	
DEXLON CHARLES,	
on behalf of himself, FLSA the Class,	Collective Plaintiffs, and
me Class,	Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Danium Gur	ino
Address	
City:	_State: Zip:
Telephone Number	ocial Security No.:
E-mail Address:	
SIGNATURE:	Date: 11-2-23

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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacie 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES	S,			
on behalf of himself,	FLSA	Collective	Plaintiffs,	and
the Class,				

Plaintiff,

Defendants

V.

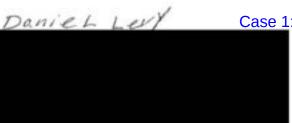
PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA, Case No.: 22-cv-04232

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: <u>Daniel Le</u> Address		
City	State:	Zip:
Telephone Numbe	I Security No.	
E-mail Address		
SIGNATURE: Lancel	Levy	Date: 12-16-2022



Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 41 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Planacle 215 (b)

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LEE LITIGATION GROUP, PLLC
148 WEST 24TH STREET, EIGHTH FLOOR
NEW YORK, NEW YORK 10011

DANIEL SANCHEZ GARCIA

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and

Plaintiff,

v.

the Class.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA.

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Daniel Sa	inchez Garcia	
City:	State:	Zip:
Telephone Number:	Social Security No.:	
E-mail Address:		
SIGNATURE:	200	Date:

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff.

v.

Case No.: 22-cv-04232

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA

NOTICE OF PENDENCY OF LAWSUIT REGARDING WAGES

Defendants.

Please read this notice if you are a former or current journeymen, electrician, laborer, or helper, employed by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019, and the present.

Former employee Dexlon Charles ("Plaintiff") has sued Pinnacle Too, LLC., d/b/a Pinnacle Electric, Agir Electrical, LTD., d/b/a Pinnacle Electric, Frankcrum 6, INC., d/b/a Frankcrum, Frank Crum Jr, and Antony Gironta (collectively, "Defendants"), seeking (1) unpaid wages, including unpaid overtime, due to time shaving, (2) unpaid wages, including overtime, due to illegal rounding, (3) unpaid wages from compensable break time, (4) statutory penalties, (5) liquidated damages, and (6) attorneys' fees and costs.

The lawsuit's federal collective Fair Labor Standards Act ("FLSA") claims seek unpaid wages, including overtime, due to time-shaving, illegal rounding, unpaid wages from compensable break times, liquidated damages, and attorneys' fees and costs. Defendants deny that Plaintiff's claims have merit. The purpose of this Notice is to advise you of your right to participate in this lawsuit under the FLSA. This Notice applies only to FLSA collective action claims.

The Court has not decided the merits of any claims or any defenses asserted by any party to this lawsuit or whether any party is right or wrong. You are under no obligation to respond to this Notice.

YOUR LEGAL RIGHTS

If you worked for Agir as a journeymen, electrician, laborer or helper at any time between May 23, 2019 and the present and believe that you may be able to assert any of the claims described above, you have the right to participate in this lawsuit. It is your right to join or not to join this lawsuit. If you decide to join this lawsuit, it is illegal for Defendants to retaliate, discharge, take any adverse action, or discriminate against you in any way for participating in this lawsuit.

If you participate in this lawsuit's FLSA claims, you will be required to provide information and answer questions, and you may be required to testify at a deposition and in court and to produce documents. You will also be bound by the outcome of this lawsuit's FLSA claims, whether it is favorable or unfavorable to the plaintiff. If you choose not to join this lawsuit, you will not be entitled to share in any amounts recovered from a trial or settlement of this lawsuit. You will also not be bound by any ruling, judgment or settlement rendered in this lawsuit.

To join this lawsuit, you must sign a "Consent to Sue" form, which is enclosed with this Notice, and send it on or before **December 30, 2022**:

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Email: cklee@leelitigation.com

If you do not join this lawsuit, and instead intend to bring your own lawsuit, you should be aware that the lawsuit must be brought within a specific period of time. Generally, the statute of limitations under the FLSA is two or three years from the date of the violation.

THE LAWYERS REPRESENTING PLAINTIFF

If you join this lawsuit and agree to be represented by Plaintiff through his attorneys, you will be represented by Lee Litigation Group, PLLC. The firm is handling the lawsuit on a "contingency fee" basis, which means that you do not have to pay any attorneys' fees or expenses for this lawsuit. If the plaintiff win a favorable judgment, Lee Litigation Group, PLLC may ask the Court to award it up to one-third of the monetary recovery. You are not required to have Lee Litigation Group, PLLC represent you. If you want your own attorney to represent you in this lawsuit, however, you will be responsible for paying that attorneys' fees and expenses.

GETTING MORE INFORMATION

You can obtain more information about this lawsuit by contacting C.K. Lee, Esq.:

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Email: cklee@leelitigation.com

Do not call or write the Court or the Clerk's Office with questions.

Dated: New York, New York, October 31, 2022.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Defendants

Name: ERROL SI	nith	
Address		
City:	State: _	Zip
Telephone Number:	Social Security No.:	
E-mail Address		
SIGNATURE: Quick	Snuth Dar	te: 11-15-22

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

Defendants

V.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA, Case No.: 22-cv-04232

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Name: EUSEBio	QuispE Quis	PE
Address		
City:	State:	Zip:
Telephone Number:	Social Security No.:	
E-mail Address		
SIGNATURE:	en d	Date: 11-28-22

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 48 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON	CH	ARL	ES,
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on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

Defendants

V,

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Name: Ezequiel Cues Address:	ita	
City:	State:	_Zip:
Telephone Number	Social Security No.	
E-mail Address:		
SIGNATURE: Seggi Da	<i>F</i> .	Date: ///28/2027



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,]
on behalf of himself, FLSA Collective Plaintiffs, and	
the Class,	
Plaintiff,	
v,	
1992.0	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA,	
Defendants	

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Felix	Le. to	2020	JIMEN	28	
Address					
City: _		Stat	te: _	Zip:	
Telephone Number		ecial	Security No		
E-mail Address:					
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Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 52 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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"CONSENT TO SUE" FORM TRICT COURT

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff.

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Defendants

Name: Felis R.	mera Manso	
Address:		
City:	State:	Zij
Telephone Number	Social Security No	
E-mail Address:		
SIGNATURE: Felle	Date:	115/22

Felir Rivera Monso

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 54 of 198

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to: 148 west 24thst 8th Floor NY NY 10011 Ferm lee Litigation group

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"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Defendants

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs,	ana
the Class,	

V,

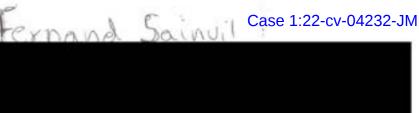
PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Fernand	Sainvil			
Address:				
City:	_State:	Z	Cip:	
Telephone Numbe	ocial Security No.:			
E-mail Address:				
SIGNATURE: Ferman	d Samuel	Date:	109	7033



Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 56 of 198





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pincocle 236 (b)

10011-195208

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, a	nd
the Class,	
Plaintiff,	
v.	

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR.,

and ANTONY GIRONTA.

Defendants

Case No.: 22-cv-04232

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Name: Tred: Parte To	pan	
Address:		
City:	State:	Zip
Telephone Numbe	Social Security No.	-
E-mail Address: _		
SIGNATURE: July		Date: November 4, 2022.



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

(1975)		
DEXLON CHARLES,		
on behalf of himself, FLSA the Class,	Collective Plaintiffs,	and
	Plaintiff,	

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: TIGNAL (Address:	orong	
City:	State	Zip:
Telephone Numbe	_ Social Security No.:	
E-mail Address		
SIGNATURE: Gian:	Votory D	ate: 11/4/22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA	Collective Plaintiffs,	ana
the Class,		
	Plaintiff,	
v.	T 9	

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

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Case No.: 22-cv-04232

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

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Tel: (212) 465-1180 Fax: (212) 465-1181

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Address:		
City: _	State:	Zip
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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

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UNITED	STATES	DISTI	RICT	COL	RT
SOUTHE	RN DIST	RICT	OF N	VEW	YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1180

Defendants

Name: Henrry	JEOVANNY	CAZORIA	JARA	_
Address				
City:	U	State:	Zip:	
Telephone Number:		Social Security No.:_		_
E-mail Address:				
SIGNATURE:	y Bydy		Date: /2 - 20 - 2	2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

V.

Case No.: 22-cv-04232

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA,

Defendants

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Henry Manguan		
Address:		
City:	State: _	Zip
Telephone Number:	Social Security No.:	-
E-mail Address:		
SIGNATURE:	ten Jeerry	Date: Nov . 13 /2022 .

Henry Managuan Case 1:22-0

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 66 of 198





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pimacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CH	1ARI	ES.
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on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

٧.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR.,

and ANTONY GIRONTA,

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

I hereby consent to join this lawsuit as a party plaintiff. By signing and returning this consent form, I hereby designate Lee Litigation Group, PLLC to represent me and make decisions on my behalf concerning the litigation and any settlement.

Address

City: State: Zip:

Telephone Number ocial Security No.:

E-mail Address:

SIGNATURE: Date: 11/2/22

Herman Cando Case 1:

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 68 of 198

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Lee Litigation Group, FLLC 148 West 24th Street, 8th Floor New York, NY 10011 Planocle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CH	[AR]	LES

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

Defendants

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Name: IVAN A	BARIAS BAK.	2
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City: _	State:	Zip:
Telephone Number:	ocial Security No.	:_
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SIGNATURE		Date: 11-29-2022

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C. K Lee, Esq. Lee Latigation Group, PLLC 148 West 24th Street, 8th Floor New York, My 1011.

10011-195208

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"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and the Class, Plaintiff,	
7.00	4
v.	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR	

and ANTONY GIRONTA,

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: 'Jubari	Baxter	
Address:		
City:	State:	Zip:
Telephone Number:	Security No.:	
E-mail Address:		
SIGNATURE: BOLE	tea	Date: 12-1-22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA the Class,	Collective Plaintiffs, and
me Ciass,	Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq.
Lee Litigation Group, PLLC
148 West 24th Street, 8th Floor
New York, NY 10011
Tel: (212) 465-1180
Fax: (212) 465-1181

Name:		
Address:		
City:	State	_Zip:
Telephone Number	ocial Security No.:	
E-mail Address:		
SIGNATURE SALLY S	intell	Date: 1/- 22- 2022

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 74 of 198

NEW YORK NY 100

148 west 24th Street, 8th Floor New York, N.Y 10011

10011-195208

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CH	AR	IFC
DEAL	r_{ij}			Lilio.

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

٧.

and ANTONY GIRONTA,

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

I hereby consent to join this lawsuit as a party plaintiff. By signing and returning this consent form, I hereby designate Lee Litigation Group, PLLC to represent me and make decisions on my behalf concerning the litigation and any settlement.

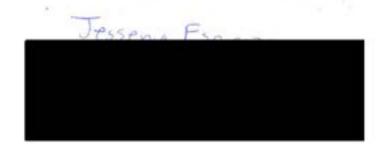
Address

Cit State: Zin:

Telephone Number Social Security No.:

E-mail Address:

SIGNATURE: Joseph Espinora Date: 12 (1) 7077





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Planacle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA the Class.	Collective Plaintiffs, and
	Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

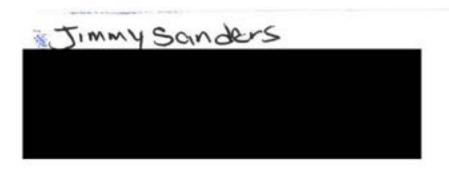
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C. K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: TIMMY Sande		*
City: _	State:	Zip
Telephone Number:	ocial Security No.	
E-mail Address:		
SIGNATURE:		Date: 11-2-2022





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OUTHERN DISTRICT OF NEW TORK	
DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, at the Class,	na
Plaintiff,	
V.	

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

ddress		8
ity	State:	Zip:
elephone Number	cial Security No.	
mail Address:		
GNATURE: Joan Pen	en Peña	Date:

Total PEREZ PEN Gase 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 80 of 198





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

10011-195208

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"CONSENT TO SUE" FORM DISTRICT COURT

Plaintiff,

Defendants

SOUTHERN DISTRICT (
DEXLON CHARLES, on behalf of himself, FLSA the Class,	Collective Plaintiffs, and

v.

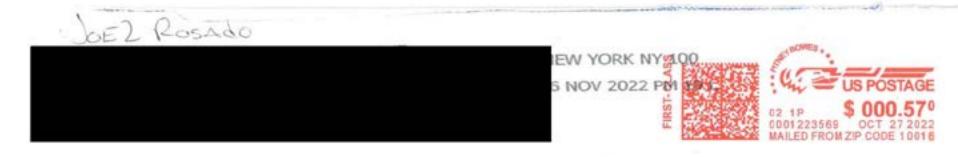
PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: OF L	LOSAdo	
City:	State:	Zip:
Telephone Numb	cial Security No.	
E-mail Addr		
SIGNATURE:	1290	Date: 11-6-2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA	Collective Plaintiffs,	and
the Class,		
	Plaintiff,	

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Defendants

Name: John Gomez		_
Addre		
City:	State:	Zip: _
Telephone Number	ocial Security No.:	
E-mail Address:		
SIGNATURE:		Date: 11 - 7 - 22
		₹



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

"CONSENT TO SUE" FORM STRICT COURT

UNITED	STATES	DISTRIC	T COURT
SOUTHE	RN DIST	RICT OF	NEW YORK

DEXLON	CHA	RLES.
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on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

Defendants

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Jonathan	Hussello	
Address		
City	State:	Zip:
Telephone Number	ial Security No	_
E-mail Address:		
SIGNATURE: Jonathon	Russelle 1	Date: 11/3/22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (h)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA the Class,	Collective Plaintiffs, and
	Plaintiff.

V.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA, Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Jonathan	Carela	
Address		
City:	State:	Zip: _
Γelephone Number	Social Security No	
E-mail Address:		
SIGNATURE: Anathon	Carela	Date: 11 4 2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES	,			
on behalf of himself, F	FLSA	Collective	Plaintiffs,	and

Plaintiff,

V.

the Class.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Defendants

Name: Jonathan Espi	nal	_	•
Address:			50
City:	State:	Zip: _	
Telephone Number	ocial Security No.:		
E-mail Address:			_
SIGNATURE:		Date: 12/23/22	20





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Planacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, and	
the Class,	
Plaintiff,	
v.	
	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA.	

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C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1180

Name:	JORGE	Bonilla				
Address:					·	
City:			State:		Zip:	
Telephon	e Number:		cial Security N	o.	<u> </u>	
E-mail A	ddress:					
SIGNATU	URE:	ye Bould	5	Date:	11/5/2022	L



Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 92 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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and

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA	Collective	Plaintiffs

Plaintiff,

V.

the Class.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name:	ando Grarcia	
City: _	State:	Zip: _
Telephone Number	Social Security No.:_	
E-mail Address:		
SIGNATURE:	>	Date: 12/26/22

Jose O. Gurcia C

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 94 of 198

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLO	ON C	HA	RL	ES.
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on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

Defendants

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

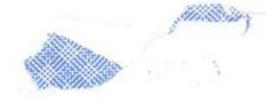
Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Jose L Pe	ina Luna	
Address:		
City:	State:	Zip:
Telephone Number	Social Security No.	
E-mail Address		
SIGNATURE:		Date: 11/2/22





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLE	S,			
on behalf of himself,	FLSA	Collective	Plaintiffs,	and
the Class.				

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

Defendants

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

C. K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Jose Ponciano	Tun	Sirin	
Address:			
City:	State:		Zip
Telephone Number	Social Se	curity No.:	
E-mail Address:			
SIGNATURE: Jay Sues		Date	11-17-2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocie 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLS the Class.	SA Collective Plaintiffs, and
me Ciuss,	Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Tose 16	rres	
City	State:	Zi _I
Telephone Number	Sicial Security	No.:
E-mail Address:	98	
SIGNATURE: Jose 7	nes	Date: 12-21-2022

Case 1:22-cv-0

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 100 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Planacle 216 (b)

10011-195208

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff.

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
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Case No.: 22-cv-04232

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C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Jose VASquet		
Address:		
City:	State	Zip:
Telephone Number	Social Security No.:	
E-mail Address		
SIGNATURE:	Da	te: 12 16-72

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 102 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, a	ana
the Class	

Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: JoshuA	Hunter		
Address:			
City	Stat	te: _	Zip:
Telephone Numbe	Social	Security No.	
E-mail Address:			
SIGNATURE: 2. Ha	ntec	Date: _	11/4/22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Piannele 216 (b)

"CONSENT TO SUE" FORM TRICT COURT

OUTHERN DISTRICT OF NEW YORK
DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and the Class,
Plaintiff.

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Defendants

Name: Jourdan	Phillip	
Address:		
City	State:	Zip
Telephone Number	Social Security N	
E-mail Address:		3 Of 28
SIGNATURE:	meso	Date: 11/13/22



Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 106 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pannacle 215 (b)

10011-195208

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARL	ES,
	f, FLSA Collective Plaintiffs, and
the Class,	Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name:	Juan	Diaz	Yeque		
Address:					
City: _		<u>40</u>	_State:	Zip:	
Telephone	e Number:	80	ocial Security No.:_		
E-mail Ad	ldress:				
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Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 108 of 198





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Finnacle 216 (b)

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"CONSENT TO SUE" FORM RICT COURT

UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	

DEXLON CHARLES,	
on behalf of himself, FLSA	Collective Plaintiffs, and
the Class,	Dlaintiff

V.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA, Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Defendants

Name: Juana Mora	Mora	
Address:		
City:	State:	Zip:
elephone Number:	Social Security No.:	
E-mail Address:		
SIGNATURE: Juana Me	va Hova I	Date: 11/28/22





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CITY, Lee, Esq. Lee Litigation Group, PLIC 148 West 24th St. 8th Floor Naw Yorky NY 10011

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and

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective	Plaintiffs,
the Class,	

Plaintiff,

Defendants

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Julia	Adamis Rambrez R	Lasaria
Address:		
City:	State	_Zip: _
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SIGNATURE: Jul	lão A. Gamices	Date: 11/26/2022

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 112 of 198

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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES.

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

٧.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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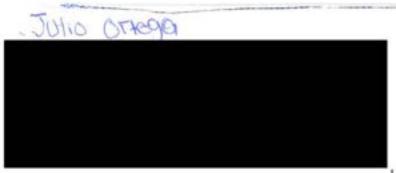
C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181







Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pianacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, and	
the Class,	
Plaintiff,	
v.	
2	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA,	
Defendants	

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: VULIO MANUE	- CRAMIREZ 7	EREZ
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E-mail Address: _		
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> Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,
on behalf of himself, FLSA Collective Plaintiffs, and
the Class,

Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CH/	RI	ES.
And American Section		~ 4 44	***	at the state of the

on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff.

Defendants

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

I hereby consent to join this lawsuit as a party plaintiff. By signing and returning this consent form, I hereby designate Lee Litigation Group, PLLC to represent me and make decisions on my behalf concerning the litigation and any settlement.



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 226 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT	JI NEW YORK
DEXLON CHARLES,	
on behalf of himself, FLSA	Collective Plaintiffs, and
the Class,	Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Kevin	Maintosh	
Address:		
City:	State:	Zip:
Telephone Numbe	cial Security No.:_	
E-mail Address: _		
SIGNATURE: K	Maintosh	Date: 11-18-22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLE	S,			
on behalf of himself, the Class,	FLSA	Collective	Plaintiffs,	ana

Plaintiff,

Defendants

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: _	Kevon	Walters	
Address:			
City:		State:	Zip
Telephor	ne Number:	al Security No.:	
E-mail A	Address:		
SIGNAT	ure: K- Wa	lters	Date: 11/3/2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself FISA Collective	PL

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq.

Defendants

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

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elephone Numbe	Social Security No.:	
-mail Addres		
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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

Case No.: 22-cv-04232

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES.			
on behalf of himself. FLSA	Collective	Plaintiffs,	ana
the Class.			

Plaintiff.

PINNACLE TOO. LLC.

d/b/a PINNACLE ELECTRIC.

V.

AGIR ELECTRICAL, LTD...

d/b/a PINNACLE ELECTRIC,

FRANKCRUM 6. INC.

d/b/a FRANKCRUM.

FRANK CRUM JR.,

and ANTONY GIRONTA.

Defendants

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C. K. Lee, Esq.

Lee Litigation Group, PLLC

148 West 24th Street, 8th Floor

New York, NY 10011

Tel: (212) 465-1180

Fax: (212) 465-1181

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C.K. Lee Esq. Lee Litigation Grap, PLLC 148 West 24th St, 8th Floor New York, NY 10011

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLE	ES,
on behalf of himself, the Class.	FLSA Collective Plaintiffs, and
3	Plaintiff,

v

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name:	Dis Fabian Ren	ves Saldana
Address:		
City:	State:	Zin:
Telephone	Social Security	y No.:
E-mail Address: _		
SIGNATURE:	IBIAN KEYES	Date: 11/6/22





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

Defendants

v.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA, Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

I hereby consent to join this lawsuit as a party plaintiff. By signing and returning this consent form, I hereby designate Lee Litigation Group, PLLC to represent me and make decisions on my behalf concerning the litigation and any settlement.





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES.

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff.

v.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR.,

and ANTONY GIRONTA,

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Mahamadou G	Touray		
Addres			
City	State	Zip	
Telephone Numbe	ocial Security No.:		
E-mail Address			
SIGNATURE:		Date: 11/06/2022	



Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 134 of 198

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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CHA	RI	ES.
And And Children	1.71			

on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

V

Case No.: 22-cv-04232

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCŘUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Defendants

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C. K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Manuel	abraham	Gomez	checo		
Address:					
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E-mail Address:					
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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA the Class.	Collective Plaintiffs,	ana
	Plaintiff,	

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name:	Marco	Xelliva		
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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARI	LES.	
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on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA.

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

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E-mail Address:		
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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON (CHAR	RLES.
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on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

Defendants

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Address:	Igard	
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Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 142 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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DEXLON	CH	AKI	ES.

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

Defendants

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
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Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Nestor 0	Riago Peñz	
Address:	,	
City: _	State: _	Zip: _
Telephone Numbe	ocial Security No.:	
E-mail Address:		
SIGNATURE: Vultur	Dan Dan	te: 11/17/22

From Nestor O. RicCase 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 144

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To: Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216(b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CH	ARI	FS
				and the state of the

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1180

Defendants

Name: Nicholas	ferdinand	
Address		
City: _	State:	Zip:
Telephone Number	ocial Security No.:	
E-mail Address		
SIGNATURE: N	erdinand	Date: 11/23 / 22

Wiche Los Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 146 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,		
on behalf of himself, FLSA	Collective Plaintiffs,	and
the Class,	Plaintiff,	

V.

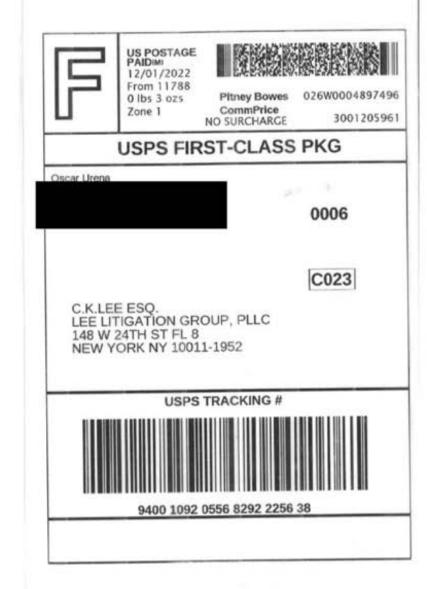
PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name:OSCar	Urena			_
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Telephone Number	Social	Security No.		
E-mail Address:				
SIGNATURE: Ose	of Own	Date: _	11/1/22	



"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, and	
the Class,	
Plaintiff,	
V.	
	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA,	
Defendants	

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Portrick A	Rose	
Address:		
City:	State:	Zip:
Telephone Number	Social Security No.:	
E-mail Address		
SIGNATURE: Flace		Date: 12/1/2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

		at their site.
DEXLON	CILAD	LEC
THE X LUIN	LHAR	1.1.3.

on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

Defendants

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: PHIXELY	HYATT	
Addresses City	State:	Zip:
Telephone Number: E-mail Address:	Social Security No.	
SIGNATURE: Phixely D	Gatt	Date: 11 - 04 - 2022

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 152 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

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UNITED STATES DISTRICT COURT

tiffs, and

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC,

FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA.

Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

I hereby consent to join this lawsuit as a party plaintiff. By signing and returning this consent form, I hereby designate Lee Litigation Group, PLLC to represent me and make decisions on my behalf concerning the litigation and any settlement.

Address:			
City:	State:	Zip:	
Telephone Number:	Social Security No.		
E-mail Address:			

SIGNATURE: prince Wesley Amore Date: 11-03-2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEAL OIL CITIES IN	DEXL	ON	CHA	RL	ES,	
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on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

Defendants

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Tel: (212) 465-1180 Fax: (212) 465-1181

Name: R Amon	MAISONET	
Address		
City:	State:	Zip:
Telephone Number	Social Security No	
E-mail Address:		
SIGNATURE:	Da Da	ate: 11/2/22



Lee Litigation Group, FLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SOUTHERN DISTRICT	OF NEW YORK
DEXLON CHARLES,	
on behalf of himself, FLS	SA Collective Plaintiffs, and
the Class,	
150	Plaintiff,
v,	
PINNACLE TOO, LLC,	

Case No.: 22-cv-04232

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Defendants

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1180

Name: Reynaldo	Comisario	
Address		
City: _	State:	Zip:
Telephone Number	al Security No.:	
E-mail Address:		
SIGNATURE. No a de	COMIBATO	Date: 12/12/2022.





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CH	AR	LES

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff.

Defendants

v.

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., and ANTONY GIRONTA. Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: RoberTo Pet	ERS MATEO	
Address		
City:	State:	Zip
Telephone Number	Social Security No	
E-mail Address:		
SIGNATURE:		Date: 7-11-2023.



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SOUTHERN DISTRICT OF NEW YORK	
DEXLON CHARLES, on behalf of himself, FLSA Collective Plaintiffs, and the Class,	
Plaintiff,	
v.	
PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM,	Case No.: 22-cv-04232
FRANK CRUM JR.,	

Defendants

and ANTONY GIRONTA.

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Konald 67000	en	
Address:		
City:	State:	Zij
elephone Number:	Social Security No.	
-mail Address:		
GIGNATURE: Johal A	Lordu	Date: 11/4/22



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CHA	ARI	ES.

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

Defendants

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C. K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Sajal	Kumar Narn	
Address:		
City:	State:	Zip: _
Telephone Number:	Security No.:	
E-mail Address: _		
	jal Kuming Natu	Date: 11/14/2022

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 164 of 198

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Phinocle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

Defendants

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Sammy	Kistoo			-
Address:				2
City:		_State:	Zip:	
Telephone Numb		Social Security No).:	
E-mail Address:				
SIGNATURE: Sor	Lite		Date: 11/28/2022	

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 166 of 198

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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs	, and
the Class,	

Plaintiff,

Defendants

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: SHAKEIBA	CONKIN	
Address		
City	State:	Zip:
Telephone Numbe	_ Social Security No	
E-mail Address		
SIGNATURE: John	Date Date	e: 11-7-2022

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Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 168 of 198

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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Planacle 216 (b)

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"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,
on behalf of himself, FLSA Collective Plaintiffs, and the Class,
Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Name: Sheldon	Moore	
Address:		
City: _	State	Zip:
Telephone Numbe	Social Security No.	
E-mail Address:		
SIGNATURE:	Moon	Date: 11-4-2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEVI ON OUT DI EC	
DEXLON CHARLES,	
on behalf of himself, FLSA	Collective Plaintiffs, and
the Class,	Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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Defendants

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Shon ontel solo	mon Gentle	
Address City:	State:	Zip:
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E-mail Address:		
SIGNATURE: Show Goutle	Dat	e: 11-10-202Z

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Lee Litigation Groupple
146 west 24th street 8th Floor
New york Ny 1001/
Dinocie 216 (b) դոլլոլլենի հումուրյիր վերականի հինդերի վերի վե

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES, on behalf of himself, FLSA	Collective	Plaintiffs,	and
the Class.			

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Defendants

Name: 9hy-guan P	aker	
Address		
City	State:	Zip
Telephone Numbe	ocial Security No.	
E-mail Address		
SIGNATURE:		Date: 1102/22
Sidiritions.		





Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pianocie 216 (h)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXL	ON	CH	ARI	FS
DEAL	1111	CII	V-71.7T	44.00

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

v.

and ANTONY GIRONTA,

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,

Case No.: 22-cv-04232

Defendants

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C. K. Lee, Esq.
Lee Litigation Group, PLLC
148 West 24th Street, 8th Floor
New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Name: Simeon	tastman		
Address:			
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E-mail Address:	1		
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Simeon Eastman

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 176 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,			
on behalf of himself, FLS.	4 Collective	Plaintiffs,	ana
the Class,			

Plaintiff,

v.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,
Defendants

Case No.: 22-cv-04232

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Fax: (212) 465-1181

Name: Tafari	A	Montague	
Address:			
City:		State:	Zip:
Telephone Number		cial Security No.	
E-mail Address:			
SIGNATURE:	Monte	oque.	Date: 11-08-22

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Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 178 of 198

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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"CONSENT TO SUE" FORM ES DISTRICT COURT

UNITED	STATES	DISTRIC	T COURT
SOUTHE	RN DIST	RICT OF	NEW YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA.

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Defendants

Name: Terry Hall		
Address:		
City:	_State:	Zip:
Telephone Number	ocial Security No.	
E-mail Address		<u>-</u>
SIGNATURE: T. HOW		Date: 11/6/22

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Lee Lifigation Group, PLLC 148 West 24th street 8th floor New York, NY 10011

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, and	
the Class,	
Plaintiff,	
v.	
	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA,	
Defendants	

If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to

C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

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Lee Litigation Group, PLLC 148 W 24th Street, Eighth Floor New York, New York 10011 Pionacle, 214 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, and the Class,	
Plaintiff,	
V.	Case No.: 22-cv-04232
PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC,	2
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA, Defendants	
Detendants	

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Tel: (212) 465-1180 Fax: (212) 465-1181

decisions on my benan conce	rning the inigation and any settler	nent.
Name: Timofei	Mokhanov	
Address:		
City:	State:	Zip:
Telephone Number:	Social Security No.:	
E-mail Address:		
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Timofer Mokhano Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 184 of 198



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXI	ON.	CHA	ARI	ES.

on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

V.

and ANTONY GIRONTA.

Case No.: 22-cv-04232

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR.,

Defendants

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C. K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor

New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

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TRINESHA CLARKE

Case 1:22-cv-04232-JMF Documen 40 C F ed 01/10/23 Page 186 of 198







Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CH	IARL	ES.
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on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

V.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011

Tel: (212) 465-1180 Fax: (212) 465-1181

Defendants

Name: Typeu BROWN		- 2
Address:		
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Telephone Number:	Social Security No.:_	
E-mail Address: _		
SIGNATURE: Zyull Brown	- D	Date: 12-01-22

Case 1:22-cv-04232-JMF Document 40-1 Filed 01/10/23 Page 188 of 198

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"CONSENT TO SUE" FORM ATES DISTRICT COURT

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class.

Plaintiff,

٧.

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
and ANTONY GIRONTA,

Case No.: 22-cv-04232

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C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

Defendants

Name: TUShawn	Lee	
Addre		
City:	State	Zip:
Telephone Number	ial Security No).;
E-mail Address:		
SIGNATURE: TyShan	nlee	Date: 11-03-2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnocle 216 (b)

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"CONSENT TO SUE" FORM TES DISTRICT COURT

UNITED STATES DISTRICT	COURT
SOUTHERN DISTRICT OF N	EW YORK
DENT ONLOTH DIEG	

DEXLON CHARLES,

on behalf of himself, FLSA Collective Plaintiffs, and the Class,

Plaintiff,

Defendants

٧.

and ANTONY GIRONTA,

PINNACLE TOO, LLC, d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR., Case No.: 22-cv-04232

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NEW YORK NY 100

C.K Lee, Esq.

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Lee Litigation Group, PLLC

148 West 24th Street, 8th Floor

New York , NY 10011

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SOUTHERN DISTRICT	OF NEW YORK
DEXLON CHARLES,	economica de ponteur angles
on behalf of himself, FLS	A Collective Plaintiffs, and
the Class,	
	Plaintiff,
v.	
PINNACLE TOO, LLC,	ECTRIC

d/b/a PINNACLE ELECTRIC, AGIR ELECTRICAL, LTD., d/b/a PINNACLE ELECTRIC, FRANKCRUM 6, INC. d/b/a FRANKCRUM, FRANK CRUM JR.,

and ANTONY GIRONTA,

Defendants If you are or were employed as a journeymen, electrician, laborer, or helper by Agir Electrical, LTD. d/b/a Pinnacle Electric ("Agir") at any time between May 23, 2019 and

Case No.: 22-cv-04232

the present, complete and mail this "Consent to Sue" Form by December 30, 2022 to C. K. Lee, Esq. Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Tel: (212) 465-1180

Fax: (212) 465-1181

decisions on my benan concerning to	ie neigation and any settler	ii cii ci
Name: Walter JAM	ES MillER	11
Address:		
City	State: _	lip:
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E-mail Address:		
SIGNATURE: Walt 1	Till 1	Date: November 10
		2022



Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

"CONSENT TO SUE" FORM UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEXLON CHARLES,	
on behalf of himself, FLSA Collective Plaintiffs, and	
the Class,	
Plaintiff,	
v.	
****	Case No.: 22-cv-04232
PINNACLE TOO, LLC,	
d/b/a PINNACLE ELECTRIC,	
AGIR ELECTRICAL, LTD.,	
d/b/a PINNACLE ELECTRIC,	
FRANKCRUM 6, INC.	
d/b/a FRANKCRUM,	
FRANK CRUM JR.,	
and ANTONY GIRONTA,	

Defendants

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ity:	State:	Zip:
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Lee Litigation Group. FLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SOUTHERN DISTRICT OF NEW YORK		
DEXLON CHARLES,		
on behalf of himself, FLSA	Collective Plaintiffs, and	
the Class,		
	Plaintiff,	
v.		
PINNACLE TOO, LLC,		

PINNACLE TOO, LLC,
d/b/a PINNACLE ELECTRIC,
AGIR ELECTRICAL, LTD.,
d/b/a PINNACLE ELECTRIC,
FRANKCRUM 6, INC.
d/b/a FRANKCRUM,
FRANK CRUM JR.,
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Defendants

Case No.: 22-cv-04232

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New York, NY 10011 Tel: (212) 465-1180 Fax: (212) 465-1181

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Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, NY 10011 Pinnacle 216 (b)

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